In section 7 of the Office Action, claims 1 through 3, 6, 7 and 9 through 25 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,549,216 to Schumacher et al. (hereinafter "the Schumacher et al. patent") in view of U.S. Patent No. 6,502,102 to Haswell et al. (hereinafter "the Haswell et al. patent"). Applicants respectfully traverse the rejection.

Claim 1 provides for a process for automatically revising data in a database of file records stored in a computer. The process includes:

(a)   identifying an occurrence of an event that occurs while a task is being accomplished to revise an entry in a database of file records; and

(b)   recording in a memory, a response to the event performed by a human operator interacting with a graphical user interface of a computer, to form one or more emulated responses to the event, wherein the one or more emulated responses are stored in an emulated event handler for performing the task.

The process further includes:

(c)   repeating the identifying and the recording to form a collection of emulated event handlers corresponding to events that may occur during the task;

(d)   selecting a batch of file records that require the task to be performed to execute revisions from a database of file records;

(e)   loading a specified task and the collection of emulated event handlers for such task into a computer; and

(f)   executing the task on the selected batch of file records by matching a member of the collection of emulated event handlers to a given event.

Page 3 of the Office Action suggests that the Schumacher et al. patent teaches identifying an occurrence of an event that occurs while a task is being accomplished to revise an entry in a database of file records. Applicants respectfully disagree.

The Schumacher et al. patent discloses <u>recording events that result from user interaction with various components of an applet</u>, such as a Java applet (col. 2, lines 14-17). When a user interaction sequence with an applet occurs, events of a selected type are detected by an automator listener that generates and stores queued event objects in an automator queue (col. 2, lines 23-26).

The Schumacher et al. patent discloses that <u>an event is stored</u>. However, Applicants have not found any disclosure in the Schumacher et al. patent of <u>an event that occurs while revising an entry in a database of file records</u>. Thus, the Schumacher et al. patent does not disclose **identifying an occurrence of an event** that occurs while a task is being accomplished **to revise an entry in a database of file records**, as recited in claim 1.

Page 3 of the Office Action also suggests that the Schumacher et al. patent teaches recording in a memory, a response to the event performed by a human operator. Applicants respectfully disagree.

FIG. 1 of the Schumacher et al. patent is a block diagram that illustrates operation of an applet event recorder 100. An automator listener 104 is adapted to detect a selected type of user input 110 (col. 4, lines 48 – 49). In FIG. 2, a recording options section 202 lists several exemplary event types that may be selected for recording, namely item events, action events, key events, mouse action events, mouse dragged events, and mouse moved events. Thus, in the context of the Schumacher et al. patent, a recorded event is initiated by a user input 110. The Office Action recognizes this point on page 3, where with reference to the Schumacher et al. patent it states, "the occurrence of the <u>events that result from user interaction</u> are to be detected..." (emphasis added).

The Schumacher et al. patent discloses events that are <u>a result of an action performed by a human</u>. However, Applicants have not found any disclosure in the Schumacher et al. patent of <u>a human operator responding to an event</u>. Thus, the Schumacher et al. patent does not disclose recording in a memory, **a response** to an event **performed by a human operator**..., as recited in claim 1.

Page 3 of the Office Action further suggests that the Schumacher et al. patent teaches selecting a batch of file records that require the task to be performed to execute revisions from a database of file records. Applicants respectfully disagree.

In support of its position, the Office Action states that the Schumacher et al. patent discloses selecting an event from a graphical user interface (GUI) as shown in FIG. 2, and the Office Action cites several passages, e.g., col. 5, lines 20 – 57. However, FIG. 2 and the passage at col. 5, lines 20 – 57 are directed toward an embodiment of a GUI, i.e., GUI 200, for invoking an applet event recorder 100 (col. 3, lines 23 – 25). As mentioned above, recording options section 202 lists several exemplary event types that may be selected for recording. GUI 200 also includes a playback speed section 220 that provides for several playback options (col. 8, line 45 – col. 9, line 12). Thus, the GUI of FIG. 2 enables a user to specify parameters relating to recording event and playing back events. None of the selectable events listed in recording options section 202, nor any of the cited passages, disclose selecting a batch of file records from a database of file records. Accordingly, Applicants submit that the Schumacher et al. patent does not disclose **selecting a batch of file records** that require the task to be performed to execute revisions **from a database of file records,** as recited in claim 1.

Page 4 of the Office Action suggests that the Schumacher et al. patent teaches executing the task on the selected batch of file records by matching a member of the collection of emulated event handlers to a given event. Applicants respectfully disagree.

In support of its position, the Office Action directs Applicants' attention to FIG. 2, and cites passages at col. 6, lines 15 – 35, col. 5, lines 20 – 35 and col. 5, lines 67 – 67 [sic.]. Below, Applicants explain that none of FIG. 2 nor any of the cited passages disclose executing the task on the selected batch of file records by matching a member of the collection of emulated event handlers to a given event, as recited in claim 1.

Regarding FIG. 2, the Office Action states that the Schumacher et al. patent discloses executing the selected events or files with the options shown on FIG. 2. However, as explained above, GUI 100 enables a user to specify parameters relating to recording and playing back events. None of the options shown in FIG. 2 disclose executing a task on a selected batch of file records by matching a member of a collection of emulated event handlers to a given event, as recited in claim 1.

Regarding the passage at col. 6, lines 15 – 35, the Schumacher patent discloses that (i) during normal operation of an applet, a system queue 114 dispatches an event 112 to an applet listener 116 (col. 6, lines 15 – 22), (ii) automator listeners 104 queue the event in automator queue 106 (col. 6, lines 22 – 29), and (iii) automator 102 performs additional processing to enable playback of queued events at a later time (col. 6, lines29 – 35). This passage does not disclose executing a task on a selected batch of file records by matching a member of a collection of emulated event handlers to a given event, as recited in claim 1.

Regarding the passage at col. 5, lines 20 – 35, defines features associated with various buttons illustrated in FIG. 2. This passage does not disclose that any of the features are for executing a task on a selected batch of file records by matching a member of a collection of emulated event handlers to a given event, as recited in claim 1.

Regarding the passage at col. 5, lines 67 – 67 [sic.], which Applicants assume should have been cited as lines 57 – 67, the Shumacher et al. patent describes FIG. 9, and discloses that (i) for selective event recording (col. 5, line 62), (ii) an applet event recorder 100 is associated with an applet 108 (col. 5, lines 63 – 65), and (iii) one or more types of events are then selected for recording via recording options section 202 in GUI 200 (col. 5, lines 66 – 67). This passage does not disclose that any of the features are for executing a task on a selected batch of file records by matching a member of a collection of emulated event handlers to a given event, as recited in claim 1.

Moreover, Applicants have not found any disclosure in the Schumacher et al. patent of a batch of file records. Absent such disclosure, the Schumacher et al. patent cannot be presented as disclosing executing the task on the **selected batch of file records by matching a member of the collection of emulated event handlers** to a given event, as recited in claim 1.

On page 4, the Office Action recognizes that the Schumacher et al. patent does not explicitly teach repeating the identifying and the recording to form a collection of emulated event handlers corresponding to events that may occur during the task. Therefore, the Office Action introduces the Haswell et al. patent.

The Haswell et al. patent is directed toward development of scripts (col. 1, lines 6 – 7). The scripts are developed through use of an English-based, form-driven interface (col. 7, line 47). More specifically, script data is received utilizing a language-driven interface, and the received script data is then translated into automation code (col. 16, lines 3 – 12).

Since the Haswell et al. patent is specifically directed toward development of scripts using an <u>English-based, form-driven interface</u>, it does not disclose recording in a memory, <u>a response performed by a human operator...</u>to form one or more <u>emulated responses</u> to an event. Whereas the Schumacher et al. patent does not disclose forming emulated responses, it cannot disclose repeating the identifying and the recording **to form a collection of emulated event handlers** corresponding to events that may occur during a task, as recited in claim 1.

Additionally, if the Haswell et al. patent were modified to <u>form a collection of emulated event handlers</u>, such a modification would obviate the <u>English-based, form-driven interface to develop a script</u>, as is apparently fundamental to the system described by the Haswell et al. patent. Consequently, such a modification would **change the principle of operation** of the system disclosed by the Haswell et al. patent. Therefore, the Haswell et al. patent, whether considered independently or in combination with another reference, cannot be applied in a section 103 rejection of claim 1.

Moreover, Applicants do not believe that the proposed combination of the Schumacher et al. and Haswell et al patents is proper for purposes of a section 103(a) rejection. The Schumacher et al. patent discloses <u>recording events that result from interaction with the various components of an applet</u>, whereas the Haswell et al. patent discloses that scripts are developed through use of an <u>English-based, form-driven interface</u>. Consequently, a combination of these references would (a) **change the principle of operation** of at least one of the references, or (b) render at least one of the references **unsatisfactory for its intended purpose**. Thus, the proposed combination of the Schumacher et al. patent and the Haswell et al. patent is impermissible for purposes of a section 103(a) rejection.

For the several reasons set forth above, Applicants respectfully submit that claim 1 is patentable over the cited combination of the Schumacher et al. patent and the Haswell et al. patent.

Claims 2, 3, 6, 7, 9 and 10 depend from claim 1. By virtue of this dependence, claims 2, 3, 6, 7, 9 and 10 are also patentable over the cited combination of references.

Claim 11 is an independent method claim. The method includes (a) identifying an occurrence of an event that occurs while a task is being accomplished to revise a file record, (b) recording in a memory, a response to the event performed by a human operator interacting with a graphical user interface, and (c) storing the response in an emulated event handler.

As explained above in support of claim 1, the Schumacher et al. patent discloses that an event is stored, and Applicants have not found any disclosure in the Schumacher et al. patent of an event that occurs while revising an entry in a database of file records. Consequently, Applicants submit that the Schumacher et al. patent does not disclose identifying an occurrence of an event that occurs while a task is being accomplished to revise a file record, as recited in claim 11.

As is also explained above in support of claim 1, the Schumacher et al. patent discloses events that are a result of an action performed by a human, and Applicants have not found any disclosure in the Schumacher et al. patent of a human operator responding to an event. Thus, the Schumacher et al. patent does not disclose recording in a memory, a response to the event performed by a human operator..., as recited in claim 11.

Page 7 of the Office Action recognizes that the Schumacher et al. patent does not explicitly teach storing a response in an emulated event handler, but suggests that the Haswell et al. patent discloses this feature. However, as explained above in support of claim 1, since the Haswell et al. patent is specifically directed toward development of scripts using an English-based, form-driven interface, it does not disclose emulated responses to an event. Since the Haswell et al.

patent does not disclose emulated responses to an event, it cannot disclose storing a response to an emulated event handler, as recited in claim 11.

Additionally, as is also explained above in support of claim 1, Applicants do not believe that the Schumacher et al. and Haswell et al. patents can be properly combined in a section 103(a) rejection.

For the several reasons set forth above, Applicants respectfully submit that claim 11 is patentable over the cited combination of the Schumacher et al. patent and the Haswell et al. patent.

Claims 12 and 13 depend from claim 11. By virtue of this dependence, claims 12 and 13 are also patentable over the cited combination of references.

Claim 14 depends from claim 11 and further recites (a) repeating said identifying, said recording and said storing for a plurality of events that occur while accomplishing said task, to form a collection of emulated event handlers, (b) obtaining a record that requires said task to be performed, (c) matching a member of said collection of emulated event handlers to an event that occurs while performing said task for said obtained record, and (d) employing said member to handle said event for said obtained record. Page 9 of the Office Action suggests that the Haswell et al. patent teaches repeating, matching, and employing, as recited in claim 14. Applicants respectfully disagree.

As explained above in support of claim 1, since the Haswell et al. patent is specifically directed toward development of scripts using an English-based, form-driven interface, it does not disclose emulated responses to an event. Since the Haswell et al. patent does not disclose emulated responses to an event, it cannot disclose either of (i) repeating... to form a collection of emulated event handlers, or (ii) matching a member of said collection of emulated event handlers to an event, both of which are recited in claim 14. Thus, claim 14 is patentable over the cited combination of references, not only because claim 14 depends from claim 11, but also on its own merits.

Claim 15 depends from claim 11. By virtue of this dependence, claim 15 is also patentable over the cited combination of references.

Claim 16 is an independent claim, and includes recitals similar to that of claim 11. Therefore, claim 16, for reasoning similar to that provided above in support of claim 11, is patentable over the cited combination of references.

Claims 17 and 18 depend from claim 16. By virtue of this dependence, claims 17 and 18 are also patentable over the cited combination of references.

Claim 19 depends from claim 16, and further includes a recital similar to that of claim 14. Thus, claim 19 is patentable over the cited combination of references because claim 19 depends from claim 16, and also, similarly to claim 14, on its own merits.

Claim 20 depends from claim 16. By virtue of this dependence, claim 20 is also patentable over the cited combination of references.

Claim 21 is an independent claim, and includes recitals similar to that of claim 11. Therefore, claim 21, for reasoning similar to that provided above in support of claim 11, is patentable over the cited combination of references.

Claims 22 and 23 depend from claim 21. By virtue of this dependence, claims 22 and 23 are also patentable over the cited combination of references.

Claim 24 depends from claim 21, and further includes a recital similar to that of claim 14. Thus, claim 24 is patentable over the cited combination of references because claim 24 depends from claim 21, and also, similarly to claim 14, on its own merits.

Claim 25 depends from claim 16. By virtue of this dependence, claim 25 is also patentable over the cited combination of references.
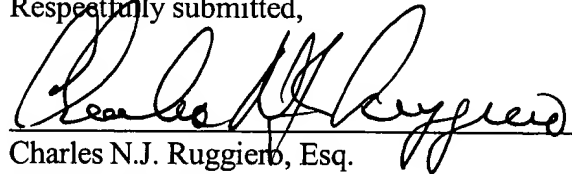
Applicants respectfully request reconsideration and withdrawal of the section 103(a) rejection of claims 1 through 3, 6, 7, and 9 through 25.

In view of the foregoing, Applicants respectfully submit that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicants respectfully request favorable consideration and that this application be passed to allowance.

Respectfully submitted,

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